

COPY

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

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In The Matter of Charges and )

Complaint Against )

RAVI KRISHNAN, M.D., )

Respondent. )

Case No. 09-12019-1

FILED

AUG 10 2009

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners, composed of Sohail. U. Anjum, M.D., Chairman, S. Daniel McBride, Member, and Van Heffner, Member, by and through Lyn E. Beggs, General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Ravi Krishnan, M.D., hereinafter referred to as Dr. Krishnan, has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Dr. Krishnan is currently licensed in active status, and was so licensed by the Nevada State Board of Medical Examiners, on September 22, 1997 (License No. 8406), pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes, and at all times addressed herein was so licensed.

2. Patient A was a newborn infant at the time of the incidents in question. Her true identify is not disclosed to protect her privacy, but her identity is disclosed in the Patient Designation served on Dr. Krishnan along with a copy of this Complaint.

3. Patient A was born on February 27, 2000 at University Medical Center in Las Vegas and was delivered by cesarean section due to fetal distress. Dr. Krishnan was present at the time of delivery. At the time of delivery Patient A's Apgar scores were 5 and 7 and one and five minutes respectively. She came out floppy and required endotracheal suction for meconium.

4. Patient A was reintubated and given intermittent positive pressure ventilation and 100% oxygen. After seven to eight minutes, Patient A's tone improved and she was sent, intubated, to the NICU.

5. Dr. Krishnan placed an umbilical artery catheter (UAC) and an umbilical vein catheter (UVC) in Patient A. Following placement of the catheters, a post-procedure chest x-ray taken at 0640, February 27, 2000, showed the UAC catheter approximately located at T7 and the UVC in the right atrium, apparently kinked in the left atrium. The UVC was pulled back by 2 cm, however, no x-ray was taken immediately after the UVC was pulled back to confirm placement.

6. Dr. Krishnan transferred care of Patient A to his partner at approximately 0800 on February 27, 2000. An x-ray was performed at approximately 1751 which should the tip of the UVC catheter at the level of T3 likely within the superior vena cava and the UAC at the level of T3 on the left. Accordingly to the nursing notes, both catheters were pulled back 2 centimeters at approximately 1815 at the direction of Dr. Krishnan's partner, the UAC was pulled back to 18 and the UVC was pulled back to 11.

7. At 0940, shortly after Dr. Krishnan came back on call on the morning of February 28, 2000, Patient A went into cardiac arrest with a drop in saturations and blood pressure and became bradycardiac.

8. Resuscitative efforts were commenced. An x-ray performed during resuscitative efforts was normal but a stat cardiac echocardiogram showed cardiac tamponade with a huge pericardial effusion.

9. Resuscitative efforts continued but Patient A's heart stopped for ten to fifteen minutes before developing a heart rate again and the UVC catheter was removed at that time.

10. An EEG was subsequently completed which was moderate to severely abnormal and was consistent with diffuse generalized encephalopathy.

11. Patient A remained in the hospital for care and continued evaluation. A neurology consult was obtained and the neurologist diagnosed Patient A as having mild to moderate hypoxic ischemic encephalopathy with seizures by history.

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12. Patient A was ultimately discharged home on March 31, 2000 with instructions to her parents for follow-up care.

**Count I**

13. Nevada Administrative Code Section 630.040 defines malpractice as the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.

14. Nevada Revised Statute Section 630.301(4) provides that malpractice is grounds for initiating disciplinary action against a licensee.

15. Dr. Krishnan failed to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances when he initially placed the UVC initially too far and failed to properly monitor the UVC placement after he pulled it back on February 27, 2000.

16. By reason of the foregoing, Dr. Krishnan is subject to discipline by the Nevada State Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

**WHEREFORE**, the Investigative Committee prays:

1. That the Nevada State Board of Medical Examiners fix a time and place for a formal hearing;

2. That the Nevada State Board of Medical Examiners give Dr. Krishnan notice of the charges herein against him, the time and place set for the hearing, and the possible sanctions against him;

3. That the Nevada State Board of Medical Examiners determine what sanctions it determines to impose for the violation or violations committed by Dr. Krishnan; and

4. That the Nevada State Board of Medical Examiners make, issue and serve on Dr. Krishnan its findings of facts, conclusions of law and order, in writing, that includes the sanctions imposed; and

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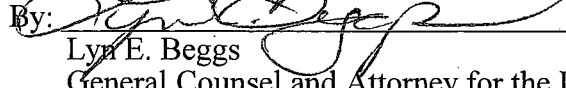
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1           5.       That the Nevada State Board of Medical Examiners take such other and further  
2 action as may be just and proper in these premises.

3           DATED this 10<sup>th</sup> day of August, 2009.

4                               THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

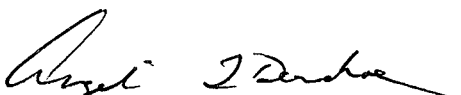
5  
6 By:   
7       Lyn E. Beggs  
8       General Counsel and Attorney for the Investigative Committee  
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**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 10<sup>TH</sup> day of August 2009, I served a file copy of the COMPLAINT, PATIENT DESIGNATION & FINGERPRINTING Information, by mailing via USPS certified return receipt mail to the following:

Ravi Krishnan, M.D.  
11447 Morning Grove Drive  
Las Vegas, NV 89135

Dated this 10<sup>th</sup> day of August 2009.

  
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Angie Donohoe  
Legal Assistant